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May 13, 2019

**Via Email and Regular Mail:**

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**mconlan@gibbonslaw.com**

Karen A. Gianelli, Esq.

Mark B. Conlan, Esq.

Gibbons P.C.

One Gateway Center

Newark, New Jersey 07102

**Re: In re: New England Motor Freight, Inc. et al.,  
Case No. 19-12809 (JKS) (Jointly Administered)  
DEMAND FOR RECLAMATION**

Dear Karen and Mark:

This firm represents McIntosh Energy Company ("McIntosh"), a creditor of New England Motor Freight, Inc. and its related debtor entities (the "Debtors"). Pursuant to 11 U.S.C. § 546 and Uniform Commercial Code § 2-702, McIntosh hereby demands reclamation with respect to all goods received by the Debtors within the twenty (20) day period prior to February 11, 2019, while the Debtors were insolvent. Attached hereto as Exhibit-A is a schedule listing all invoices for which McIntosh asserts its 20-day reclamation rights. Corresponding invoices are available upon request. The total for all goods claimed pursuant to this reclamation demand is \$17,008.28.

McIntosh demands that all goods subject to reclamation pursuant to this reclamation demand be immediately segregated from the other goods in the Debtors' possession. Further, McIntosh demands that such goods be returned to McIntosh or otherwise made available for pickup by McIntosh. Please contact me to arrange for such return.

McIntosh expressly reserves all of its rights with respect to the goods subject to this reclamation demand, including, but not limited to, its right to an administrative expense for the value of all goods delivered to the Debtors within twenty (20) days prior to the date that the Debtors filed their bankruptcy petitions, pursuant to 11 U.S.C. § 503(b)(9).

McIntosh reserves the rights to amend and supplement this reclamation demand or to file additional demands or claims, including without limitation, all other claims at law or in equity. McIntosh further reserves all of its other rights with respect to the goods subject to this demand and any other goods it has delivered to the Debtors and all other claims it holds against the Debtors.

***Founded 1850***

ALBANY

LONG ISLAND

MANHATTAN

NEW JERSEY

WASHINGTON, D.C.

*CULLEN and DYKMAN LLP*

Karen A. Giannelli, Esq.

Mark B. Conlan, Esq.

May 8, 2019


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Contemporaneously herewith, McIntosh has filed with the Bankruptcy Court its Notice of Demand for Reclamation, a copy of which is enclosed for your convenience.

Please feel free to call me with any questions.

Sincerely,

**CULLEN AND DYKMAN LLP**

  
David Edelberg

DE/hq

Encl.

Cc: Edmund P. Kos, Esq. (By Email: [ekos@ekoslaw.com](mailto:ekos@ekoslaw.com))

# Invoice

McIntosh Energy Company Inc

Created: Wednesday, April 24, 2019

Invoice Number	Invoice Date	Customer Name	Source	Type	Invoice Total	Location
CFDT-69758	01/22/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	104.59	Wayne Haven
CFDT-69757	01/22/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	183.58	Wayne Haven
CFDT-69755	01/22/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	166.58	Wayne Haven
CFDT-69746	01/22/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	118.38	Wayne Haven
CFDT-69743	01/22/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	118.82	Wayne Haven
CFDT-69735	01/22/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	305.43	Wayne Haven
CFDT-69732	01/22/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	73.46	Wayne Haven
CFDT-69731	01/22/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	58.93	Wayne Haven
CFDT-69729	01/22/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	229.33	Wayne Haven
CFDT-69727	01/22/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	14.64	Wayne Haven
CFDT-69726	01/22/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	116.68	Wayne Haven
CFDT-69719	01/22/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	51.57	Wayne Haven
CFDT-69718	01/22/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	217.85	Wayne Haven
CFDT-69717	01/22/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	235.80	Wayne Haven
CFDT-69987	01/23/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	128.49	Wayne Haven
CFDT-69985	01/23/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	173.21	Wayne Haven
CFDT-69983	01/23/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	103.64	Wayne Haven
CFDT-69960	01/23/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	249.22	Wayne Haven
CFDT-69958	01/23/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	214.28	Wayne Haven
CFDT-70323	01/24/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	199.92	Wayne Haven
CFDT-70318	01/24/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	24.12	Wayne Haven
CFDT-70317	01/24/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	88.86	Wayne Haven
CFDT-70313	01/24/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	226.75	Wayne Haven
CFDT-70297	01/24/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	104.49	Wayne Haven
CFDT-70293	01/24/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	197.81	Wayne Haven
CFDT-70373	01/25/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	14.83	Wayne Haven
CFDT-70372	01/25/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	174.69	Wayne Haven
CFDT-70346	01/25/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	169.48	Wayne Haven
CFDT-70335	01/25/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	174.75	Wayne Haven
CFDT-70333	01/25/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	256.43	Wayne Haven
CFDT-70328	01/25/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	236.75	Wayne Haven

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McIntosh Energy Company Inc

Created: Wednesday, April 24, 2019

Invoice Number	Invoice Date	Customer Name	Source	Type	Invoice Total	Location
CFDT-70581	01/26/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	191.40	Wayne Haven
CFDT-70580	01/26/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	184.78	Wayne Haven
CFDT-71006	01/28/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	103.13	Wayne Haven
CFDT-70982	01/28/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	98.01	Wayne Haven
CFDT-70981	01/28/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	121.20	Wayne Haven
CFDT-71038	01/28/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	111.19	Brookwood
CFDT-71466	01/29/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	127.06	Wayne Haven
CFDT-71456	01/29/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	107.36	Wayne Haven
CFDT-71452	01/29/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	123.43	Wayne Haven
CFDT-71450	01/29/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	72.22	Wayne Haven
CFDT-71444	01/29/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	151.32	Wayne Haven
CFDT-71425	01/29/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	223.20	Wayne Haven
CFDT-71418	01/29/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	57.96	Wayne Haven
CFDT-71409	01/29/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	236.12	Wayne Haven
CFDT-71408	01/29/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	224.51	Wayne Haven
CFDT-71693	01/30/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	137.67	Wayne Haven
CFDT-71692	01/30/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	281.07	Wayne Haven
CFDT-71679	01/30/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	7.88	Wayne Haven
CFDT-71669	01/30/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	130.54	Wayne Haven
CFDT-71668	01/30/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	124.95	Wayne Haven
CFDT-71842	01/31/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	135.13	Wayne Haven
CFDT-71836	01/31/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	137.68	Wayne Haven
CFDT-71816	01/31/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	121.75	Wayne Haven
CFDT-71815	01/31/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	148.19	Wayne Haven
CFDT-71814	01/31/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	261.68	Wayne Haven
CFDT-72055	02/01/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	80.65	Wayne Haven
CFDT-72047	02/01/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	100.98	Wayne Haven
CFDT-72023	02/01/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	221.61	Wayne Haven
CFDT-72012	02/01/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	3.51	Wayne Haven
CFDT-72011	02/01/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	236.73	Wayne Haven
CFDT-72234	02/02/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	231.77	PPSI Remotes

# Invoice

McIntosh Energy Company Inc

Created: Wednesday, April 24, 2019

Invoice Number	Invoice Date	Customer Name	Source	Type	Invoice Total	Location
CFDT-72193	02/02/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	168.47	Wayne Haven
CFDT-72406	02/04/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	118.37	Wayne Haven
CFDT-72404	02/04/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	159.10	Wayne Haven
CFDT-72395	02/04/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	94.07	Wayne Haven
CFDT-72391	02/04/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	96.51	Wayne Haven
CFDT-72390	02/04/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	91.78	Wayne Haven
CFDT-72370	02/04/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	314.55	Wayne Haven
CFDT-72631	02/05/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	47.00	Wayne Haven
CFDT-72630	02/05/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	113.06	Wayne Haven
CFDT-72625	02/05/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	93.02	Wayne Haven
CFDT-72623	02/05/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	91.82	Wayne Haven
CFDT-72594	02/05/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	231.93	Wayne Haven
CFDT-72589	02/05/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	182.89	Wayne Haven
CFDT-72584	02/05/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	217.54	Wayne Haven
CFDT-72583	02/05/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	182.17	Wayne Haven
CFDT-72879	02/06/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	85.72	Wayne Haven
CFDT-72872	02/06/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	185.17	Wayne Haven
CFDT-72871	02/06/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	82.61	Wayne Haven
CFDT-72856	02/06/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	119.96	Wayne Haven
CFDT-72841	02/06/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	226.63	Wayne Haven
CFDT-72840	02/06/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	225.53	Wayne Haven
CFDT-73119	02/07/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	64.23	Wayne Haven
CFDT-73118	02/07/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	340.52	Wayne Haven
CFDT-73115	02/07/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	110.44	Wayne Haven
CFDT-73113	02/07/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	253.00	Wayne Haven
CFDT-73110	02/07/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	188.60	Wayne Haven
CFDT-73099	02/07/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	227.81	Wayne Haven
CFDT-73094	02/07/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	194.46	Wayne Haven
CFDT-73087	02/07/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	214.93	Wayne Haven
CFDT-73084	02/07/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	225.32	Wayne Haven
CFDT-73329	02/08/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	195.11	Wayne Haven

Invoice

McIntosh Energy Company Inc

Created: Wednesday, April 24, 2019

Invoice Number	Invoice Date	Customer Name	Source	Type	Invoice Total	Location
CFDT-73298	02/08/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	185.15	Wayne Haven
CFDT-73295	02/08/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	296.37	Wayne Haven
CFDT-73293	02/08/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	246.86	Wayne Haven
CFDT-73292	02/08/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	125.43	Wayne Haven
CFDT-73479	02/09/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	240.57	Wayne Haven
CFDT-73476	02/09/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	251.24	Wayne Haven
CFDT-73686	02/11/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	254.52	Wayne Haven
CFDT-73685	02/11/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	121.07	Wayne Haven
CFDT-73684	02/11/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	172.24	Wayne Haven
CFDT-73680	02/11/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	22.13	Wayne Haven
CFDT-73679	02/11/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	197.63	Wayne Haven
CFDT-73662	02/11/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	135.51	Wayne Haven
CFDT-73658	02/11/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	211.43	Wayne Haven
CFDT-73657	02/11/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	18.53	Wayne Haven
CFDT-73656	02/11/19	NEW ENGLAND MOTOR FREIGHT	CF Tran	Invoice	159.24	Wayne Haven